



**UNITED STATES AIR FORCE
INSTALLATION RESTORATION PROGRAM
KELLY AIR FORCE BASE
SAN ANTONIO, TEXAS**

1998 BRAC Cleanup Plan (BCP)

Prepared By **CH2MHill**
Kelly Air Force Base, Texas
Contract No. F4 1650-95-D-2005-5058
NOVEMBER 1998

EXECUTIVE SUMMARY

Introduction

As part of the President's Five-Part Plan to expedite environmental cleanup at bases being closed or realigned, this Base Realignment and Closure (BRAC) Cleanup Plan (BCP) was developed to provide a "road map" for execution of environmental restoration at Kelly Air Force Base (AFB).

The BRAC Cleanup Team (BCT) was established September 18, 1996 to develop and maintain this BCP and to implement the environmental restoration activities required for property disposal. The BCT includes the Kelly AFB BRAC Environmental Coordinator (BEC), and representatives from the United States Environmental Protection Agency (EPA) and the Texas Natural Resource Conservation Commission (TNRCC). Additional other restoration and compliance decision makers support the BCT and comprise the Project Team.

This BCP presents the status, management and response strategy, and action items related to Kelly AFB's ongoing environmental restoration and associated compliance programs. The programs support full restoration of the Base property, which is necessary to meet the requirements for property disposal and reuse activities associated with the closure of the Base. The scope of the BCP considers the following regulatory mechanisms: the BRAC Act; National Environmental Policy Act (NEPA); Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) as amended by the Community Environmental Response Facilitation Act (CERFA); Resource Conservation and Recovery Act (RCRA); and other applicable laws.

The BCP is a planning document and, therefore, the information and assumptions presented may not necessarily have complete approval from the Air Force and/or federal and state regulatory agencies. The BCP is a dynamic document that will be updated regularly to reflect the current status and strategies of remedial actions. This document is the second in a series of updates/modifications since 1996 and represents conditions and strategies as of November 1998.

Status of Disposal, Reuse, and Interim Lease Process

The 1995 Defense BRAC Commission determined there was excess capacity in the maintenance depot system and infrastructure and realignment was necessary to maintain operations at reduced costs. The maintenance depot at Kelly AFB, the San Antonio Air Logistics Center (SA-ALC), was determined to be part of the excess capacity and closure proceedings were announced in July 1995. The BRAC Commission recommended that the remaining missions at Kelly AFB be realigned to neighboring Lackland AFB. The missions included: the Air Intelligence Agency, the 433rd Airlift Wing, the 149th Fighter Wing, and the 1827th Engineering Installation Squadron in addition to the associated runway and flightline. On East Kelly AFB, the following missions were also recommended for realignment to Lackland AFB. These included the AFNEWS, AFCCM, and Red Horse. The Commission also recommended the Air Force "consolidate the workloads to other DOD depots or to the private sector as determined by the Defense Depot Maintenance Council." The closing of the SA-ALC and the Defense Distribution Depot is scheduled to occur by July 2001.

Following the Kelly AFB's BRAC listing, the City of San Antonio created the Initial Base Adjustment Strategy Committee (IBASC), which, in 1995, developed the Kelly AFB Strategic Plan for the future of Kelly AFB (or the "Kelly AFB 21 vision"). In January 1996, the IBASC was dissolved and replaced by an appointed Local Redevelopment Authority known as the Greater Kelly Development Corporation (GKDC). GKDC is the federally recognized Local Redevelopment Authority responsible for development of the Master Plan for Kelly AFB.

In March 1996, the Air Force determined that approximately 1,290 acres of land at Kelly AFB were surplus. This area includes the majority of the property east of the runway, the majority of East Kelly, and the wastewater treatment plant/engine test cell area at the southern point of the Base. The GKDC's goal is to acquire all property east of the runway; however, the surplus determination indicated that significant parcels east of the runway are required for continued Air Force use.

The GKDC prepared the Kelly AFB Master/Redevelopment Plan ("Master Plan"), which includes a Target Industries Study and Joint Runway Use Analysis. The Master Plan was completed in March 1997 and closely follows the IBASC Strategic Plan.

This BCP focuses on those Kelly AFB properties identified as surplus. The BCP Study Area encompasses the properties located east of the runways, East Kelly AFB, and the wastewater treatment plant/engine test cell area at the southern point of the Base. The remainder of the Base, which will be realigned with Lackland AFB, will continue to be evaluated under the Air Force's Management Action Plan (MAP) program.

As of November 1998, there are 21 areas that have initial leases or amendments in the designated Reuse Parcels. Three are located in Reuse Parcel A, one is in Reuse Parcel B, nine are in Reuse Parcel C, five are in Reuse Parcel D and three are in Reuse Parcel E.

Status of Environmental Restoration Program

Kelly AFB is not listed on the National Priorities List (NPL). A total of 52 Installation Restoration Program (IRP) sites divided into five zones have been identified on-Base. Most of the IRP sites are regulated under the pending Base RCRA permit with TNRCC as lead regulatory agency. The site locations and zone boundaries are shown in Figure E-1 (Location of IRP Sites and Zones). The BCP Study Area encompasses the entirety of Zones 2, 3, and 4, and a portion of Zone 5.

A total of 35 IRP sites are located within the BCP Study Area. To date, no further action (NFA) is planned for 21 sites. TNRCC approved NFA for seven sites of which six have signed decision documents. Three other non-NFA sites have pending decision documents (Groundwater Zones 1, 2 and 3).

The overall IRP strategy for addressing contamination has been to address groundwater and soils independently. The zones identified by the IRP represent geographically contiguous investigative units. Contaminated groundwater has been handled as a single contiguous "unit." Groundwater remediation will consist of groundwater removal and treatment. Soils will be addressed on an operable unit (OU) basis, with soil QUs designated according to common contaminants so that technologies designed for specific contaminants may be effectively and efficiently applied.

Zones 2 and 3 are the furthest along in the CERCLA process. They are progressing in parallel and are currently in the Feasibility Study (FS) phase. Decision Documents (DD) for groundwater and soils in these zones are scheduled for completion in 1998. The overall strategy for groundwater remediation in these zones is to use the existing interim groundwater remediation systems (with necessary modifications) as the final remedies. For soil remediation, these zones have been divided into QUs based on the common contaminants. Soil remediation in Zones 2 and 3 is currently in the remedial design (RD) phase.

Zones 4 remedial feasibility investigations (RFI) for on-base properties (OUI) and off-base properties (OU2) are completed and are being reviewed for comments. In Zone 5, the final RFI is being completed.

Basewide source discovery and assessment activities include two ongoing projects. A basewide preliminary assessment/site inspection (PA/SI) was performed to identify additional sites not identified during previous investigations. Also, a Basewide Environmental Baseline Survey (BW-EBS) was performed to evaluate the overall environmental condition of Base property to support property transfer activities. These projects resulted in the identification of locations of concern (LOCs) that require further investigations.

Restoration-related compliance activities have included the following: closure and cleanup of RCRA solid waste management units (SWMUs); removal of underground and aboveground storage tanks; inspection, maintenance, and removal of oil/water separators; removal of polychlorinated biphenyl (PCB) transformers; and asbestos and lead-based paint identification, abatement, and management.

Key Restoration and Transferability Strategies and Schedules

Kelly AFB environmental program is currently in the process of shifting its focus from the activities of an active base to compliance and restoration activities for disposal and reuse of base property. The BCT has developed strategies for focusing restoration activities toward final transfer of base property. Strategies have also been developed for compliance program issues (e.g., permits) that will be critical schedule factors affecting base reuse.

A BW-EBS was performed to determine the environmental condition of base property identified for potential reuse. Site-specific EBSs (SS-EBS) were prepared for individual buildings or property areas to supplement information presented in the BW-EBS. These documents will be used to support finding of suitability to transfer/finding of suitability to lease (FOST/FOSL) determinations. The original Basewide environmental condition of property and suitability to

transfer maps provided in the BW-EBS were incorporated into the first BCP and these maps were revised for this update of the BCP using results of the 1997 annual groundwater monitoring program.

For many restoration issues, the strategies are dependent upon GKDC determining specific infrastructure items needed for reuse. Information on infrastructure needs for future tenants is critical to prioritize the restoration activities at Kelly APB. The GKDC identified specific infrastructure requirements in the Master Plan. As an overall strategy for compliance program issues, the Base, BCT, AFBCA, and GKDC representatives will meet regularly to keep the groups apprised of updated reuse needs and allow priorities for compliance program projects to be refined.

Summary of Current BRAC Cleanup Plan Action Items

As part of routinely held BCT meetings held at Kelly AFB, the BCT and Project Team members evaluate and update "bottom up" review issues for the Base. From this activity, an ongoing BCT Action Item list has been prepared and is updated on a regular basis. Table ES-i (BCT/Project Team Action Items) provides a listing of issues associated with environmental restoration, compliance, and technical/management action items that require further evaluation and implementation by the BCT/Project Team.